

Remarks

A. Claims in the Case

Claims 24, 25, 28-29, 31, 34-40, and 42 have been amended. Claims 24-44 are pending.

B. Interview Summary

Applicant thanks the Examiner for the interview on June 13, 2006. During the interview, Applicant's representative, Russell Henrichs noted several distinctions of the claimed invention over the cited art:

A. Chung, et al. (U.S. Patent No. 6,643,137) (hereinafter "Chung") does not appear to disclose at least "wherein the biasing element resiliently biases the electrically conductive connection member onto the electrically conductive contact (emphasis added)" as recited in previous claim 24 (see also claims 34, 39, and 42). While Applicant maintains his position, Applicant and the Examiner did not reach an agreement as to this issue during the interview.

B. Chung does not appear to disclose at least "an electrically conductive connection member, comprising a first piece and a second piece with a biasing element between the first piece and the second piece (emphasis added)" as recited in claim 44. Applicant and the Examiner agreed this limitation is not disclosed by Chung.

C. Chung does not appear to disclose at least "each support member being attached to at least two connection members (emphasis added)" as recited in previous claim 29. Applicant and the Examiner agreed this limitation is also not disclosed by Chung.

C. 35 U.S.C. §112 Rejection

The Examiner rejected claims 28, 36, and 37 under 35 U.S.C. §112 stating there is insufficient antecedent basis for "said connection member" recited in these claims. Claims 24, 25, 28, 29, 31, and 34-40, were amended for clarity. Applicant respectfully requests the Examiner withdraw the rejection to the claims.

D. 35 U.S.C. §102(e) Rejections

The Examiner has rejected claims 24 and 26-44 under 35 U.S.C. §102(e) as being anticipated by Chung. Applicant respectfully disagrees with these rejections.

Applicant respectfully notes the standard for “anticipation” is one of fairly strict identity. To anticipate a claim of a patent, a single prior source must contain all the claimed essential elements. *Hybritech, Inc. v. Monoclonal Antibodies, Inc.*, 802 F.2d 1367, 231 U.S.P.Q.81, 91 (Fed.Cir. 1986); *In re Donahue*, 766 F.2d 531, 226 U.S.P.Q. 619, 621 (Fed.Cir. 1985).

Applicant respectfully notes Chung does not disclose, teach, or suggest at least “the biasing element resiliently biases the first electrically conductive connection member onto the electrically conductive contact (emphasis added)” as recited in amended claim 24. The Examiner points to spring 436 of Chung to teach a biasing element and element 43 of Chung to teach a “connection member.” Applicant respectfully notes that element 43 of Chung cannot anticipate “connection member” of claim 24 because the spring 436 actually biases element 43 away from grounding member 42 (which the Examiner points to for a teaching of “electrically conductive contact”) and not “onto” as recited in claim 24. As seen, for example, in FIG. 3 and described in Chung at col. 3, lines 56-66, element 43 needs threaded shank portion 434 to grip internally threaded metal nut 65 in the positioning hole 630 to oppose the biasing force of spring 436. It appears without the threaded shank portion 434, the spring 436 would push element 43 away from contacting the grounding member 42. Therefore, Applicant respectfully submits biasing element 436 and element 43 cannot be used to teach “the biasing element resiliently biases the first electrically conductive connection member onto the electrically conductive contact” as recited in amended claim 24. Applicant respectfully asserts claim 24 and claims dependent thereon are allowable for at least the above reasons. Applicant respectfully requests the Examiner withdraw the rejection to claim 24 and claims dependent thereon.

Claim 34, 39, and 42 recite, among others, a similar limitation not disclosed, taught, or suggested by Chung. Applicant respectfully asserts claims 34, 39 and 42 and claims dependent thereon are allowable for at least the above reasons. Applicant respectfully requests the Examiner withdraw the rejection to claims 34, 39 and 42 and claims dependent thereon.

Similarly, Chung does not disclose, teach, or suggest at least “the biasing element resiliently biases the first piece and second piece apart to bias the second piece onto the electrically conductive contact (emphasis added)” as recited in claim 44. Applicant respectfully notes Applicant and the Examiner agreed this limitation is not shown by Chung in the Interview of June 13, 2006. Applicant respectfully asserts claim 44 and claims dependent thereon are allowable for at least the above reasons. Applicant respectfully requests the Examiner withdraw the rejection to claim 44.

E. 35 U.S.C. §103 Rejections

The Examiner has rejected claim 26 under 35 U.S.C. §103(a) as being unpatentable over Chung in view of Wheaton (U.S. Patent No. 5,880,930) (hereinafter “Wheaton”). Applicant respectfully disagrees with the rejections. Applicant respectfully asserts claim 26, dependent on patentably distinct claim 24, is allowable for at least the above reasons.

F. Dependent Claims

The Examiner is also respectfully requested to separately consider each of the dependent claims for patentability. Many of the dependent claims in addition to those mentioned above are independently patentable.

Chung does not appear to disclose, teach, or suggest at least “one or more support members, each support member being attached to at least two electrically conductive connection members” as recited in amended claim 29 in combination with the features of claim 24. The Examiner points to elements 631 of Chung for the teaching of support members, however, elements 631 are at least not “each... attached to at least two electrically conductive connection members (emphasis added)” as recited in amended claim 29. Applicant respectfully notes Applicant and the Examiner, in the Interview of June 13, 2006, agreed the limitation in previous claim 29 is not shown by Chung. Applicant respectfully asserts claim 29 is also allowable for at

least the above reasons.

Further, Chung does not appear to disclose, teach, or suggest at least “wherein the biasing element comprises at least two parts (emphasis added)” as recited in claim 33 in combination with the features of claim 24. Applicant respectfully asserts claim 33 is also allowable for at least the above reasons.

Chung also does not appear to disclose, teach, or suggest at least “wherein the first electrically conductive connection member comprises at least two parts” as recited in amended claim 38 in combination with the features of claim 34. Applicant respectfully asserts claim 38 is also allowable for at least the above reasons.

G. Summary

Based on the above, Applicant submits that all of the claims are in condition for allowance. Favorable reconsideration is respectfully requested.

If any extension of time is required, Applicant hereby requests the appropriate extension of time. If any fees are inadvertently omitted or if any additional fees are required or have been overpaid, please appropriately charge or credit those fees to Meyertons, Hood, Kivlin, Kowert & Goetzel Deposit Account No. 50-1505/5681-78000/BNK.

Respectfully submitted,



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